

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: MULTIPLAN HEALTH
INSURANCE PROVIDER LITIGATION

This Document Relates To:

1:24-cv-7177

1:24-cv-6802

Case No. 1:24-cv-6795

MDL No. 3121

Hon. Matthew F. Kennelly

**DECLARATION OF GRAHAM HAVILAND IN SUPPORT OF DEFENDANTS'
JOINT MOTION TO DISMISS THE CONSOLIDATED CLASS ACTION COMPLAINT**

I, Graham Haviland, declare as follows:

1. I am an associate with the law firm Latham & Watkins LLP, attorneys for Defendants MultiPlan, Inc., Claritev Corporation, Viant, Inc., Viant Payment Systems, Inc., and National Care Network, LLC in connection with this action. I submit this Declaration in support of Defendants' Joint Motion to Dismiss the Consolidated Class Action Complaint in the above captioned matter.

2. Attached as **Exhibit A** to this Declaration is a true and correct copy of a document titled "Network Rental Agreement Amendment 3," executed November 19, 2018, available at the Washington State System for Electronic Rate and Form Filing, <https://filingaccess.serff.com/sfa/home/WA>. This is the document referenced in paragraphs 222 through 230 of the Consolidated Class Action Complaint, ECF No. 172.

I declare under penalty of perjury that the foregoing is true and correct, and that this Declaration was made this 2nd day of April 2025.



Graham Haviland
of Latham & Watkins LLP

*Counsel for Defendants MultiPlan, Inc.;
Claritev Corporation; Viant, Inc.; Viant
Payment Systems, Inc.; and National Care
Network, LLC*